

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>: CRIMINAL NO. _____</b>
<b>v.</b>	<b>: DATE FILED: _____</b>
<b>MEI QIAO ZHENG,</b>	<b>: VIOLATION:</b>
<b>YAN YU ZHENG,</b>	<b>18 U.S.C. § 894(a) (conspiracy to</b>
<b>a/k/a “Auntie Bi,”</b>	<b>: collect extensions of credit by</b>
<b>a/k/a “Yi Bi,”</b>	<b>extortionate means)</b>
<b>a/k/a “B,”</b>	<b>:</b>
<b>MIN ZHANG ZHENG,</b>	<b>:</b>
<b>a/k/a “Uncle”</b>	

**INDICTMENT**

**COUNT ONE**

**(Conspiracy to Collect Extensions of Credit by Extortionate Means)**

**THE GRAND JURY CHARGES THAT:**

**INTRODUCTION**

At all times material to this indictment:

**A. Chinese Snakeheads - Human Smuggling Networks**

1. International human smuggling networks operating from the People’s Republic of China (China) were known as “snakeheads.” Snakehead organizations arranged for Chinese aliens to be smuggled out of China to places around the world, including the United States, for a fee. Snakeheads, also called “snakes,” included persons operating in China as well as the country to which the aliens were smuggled.

2. Typically, snakeheads provided transportation, food and lodging, and secured false travel documents for the smuggled aliens. Snakeheads advanced the expenses necessary to

smuggle the aliens into the United States. Often, when smuggled aliens were intercepted by immigration officials at the United States border, snakeheads arranged for legal representation or posted bail to secure the alien's release. The legal fees and bail money were added to the total smuggling debt owed to the snakeheads by the alien.

3. Snakeheads expected smuggled aliens to commence payment of the smuggling debt to the snakeheads shortly after arrival in the United States, or after release on bail from immigration custody if the alien had been arrested at the border.

4. Snakeheads used force and violence, and the threat of force and violence, to collect smuggling debts from the smuggled aliens and their families in the United States and China.

5. Snakeheads had associates in the United States who were used in various ways, including harboring smuggled Chinese aliens upon arrival in the United States; ensuring the aliens were working to pay off their smuggling debt; collecting money paid from the aliens; and, if the debt was not timely paid, enforcing collection of the debt, often by violence or by express or implicit threat of force or violence to the victim or the victim's family.

#### B. The Defendants

6. Defendant MEI QIAO ZHENG was a citizen of China and resided in Changles, a village in Fujian Province, China. Defendant MEI QIAO ZHENG was a snakehead and served as a recruiter in her village. As such, defendant MEI QIAO ZHENG, along with other snakeheads known and unknown to the grand jury, arranged and coordinated the smuggling of Chinese aliens from Fujian Province into the United States.

7. Defendant YAN YU ZHENG, a/k/a "Aunti Bi," a/k/a "Yi Bi," a/k/a "B," a

Chinese citizen, was a resident alien of the United States and resided and worked in Philadelphia, Pennsylvania. Defendant YAN YU ZHENG was an associate of defendant MEI QIAO ZHENG and served as a debt collector for the snakeheads.

8. Defendant MIN ZHANG ZHENG, a/k/a “Uncle,” a Chinese national, was a resident alien of the United States and resided and worked in Philadelphia, Pennsylvania. Defendant MIN ZHANG ZHENG was the spouse of defendant YAN YU ZHENG. Defendant MIN ZHANG ZHENG was an associate of defendant MEI QIAO ZHENG and served as a debt collector for the snakeheads.

### **THE CONSPIRACY**

9. From in or about April 2003 to in or about March 2004, in the Eastern District of Pennsylvania, and elsewhere, defendants

**MEI QIAO ZHENG,  
YAN YU ZHENG,  
a/k/a “Auntie Bi,” a/k/a “Yi Bi,” a/k/a “B,” and  
MIN ZHANG ZHENG,  
a/k/a “Uncle”**

knowingly conspired and agreed, together and with co-conspirators known and unknown to the grand jury, to participate in the use of extortionate means, within the meaning of Title 18, United States Code, Section 891(7), to collect and attempt to collect an extension of credit, within the meaning of Title 18, United States Code, Section 894, that is, a smuggling debt owed by X.G., a Chinese woman known to the grand jury, hereafter known as X.G.

### **MANNER AND MEANS OF THE CONSPIRACY**

It was part of the conspiracy that:

10. Defendant MEI QIAO ZHENG and other snakeheads, known and unknown

to the grand jury, smuggled X.G., a female alien, and her minor child, both known to the grand jury, into the United States from Fujian Province, China, on or about April 18, 2003, for a fee of \$90,000. Defendant MEI QIAO ZHENG and others, known and unknown to the grand jury, among other things, arranged transportation for X.G. and her child from X.G.'s village in Fujian Province to Beijing, and provided food and lodging in Beijing, airline tickets to the United States, and a false passport and visa enabling X.G. and her child to leave China.

11. Defendant MEI QIAO ZHENG designated defendant YAN YU ZHENG, a/k/a "Aunti Bi," to be X.G.'s point of contact in the United States and provided X.G. with the name "Bi," and defendant YAN YU ZHENG's phone number in Philadelphia, Pennsylvania.

12. Defendants YAN YU ZHENG, a/k/a "Aunti Bi," and MIN ZHANG ZHENG, a/k/a "Uncle," assisted defendant MEI QIAO ZHENG in attempting to collect the smuggling debt from X.G..

13. Payment of the smuggling debt was to commence shortly after the arrival of X.G. and her child in the United States. On or about April 18, 2003, when X.G. and her child were intercepted at JFK International airport in New York City, New York, by U. S. immigration officials and taken into custody for illegal entry into the United States, payment on the debt was to start upon X.G.'s release from the detention facility, which was located in Berks County in the Eastern District of Pennsylvania.

14. Defendants YAN YU ZHENG, a/k/a "Aunti Bi," and MIN ZHANG ZHENG, a/k/a "Uncle," told X.G. they would transport X.G. and her child from the detention facility upon release from custody and provide temporary housing for them, which would enable the defendants to control X.G., track her movements, and insure that X.G. commenced paying off

her smuggling debt.

15. Defendant MEI QIAO ZHENG directed defendants YAN YU ZHENG, a/k/a “Aunti Bi,” and MIN ZHANG ZHENG, a/k/a “Uncle,” to enforce collection of the smuggling debt from X.G., and to collect the cash from X.G. at defendant YAN YU ZHENG’s place of business in Philadelphia, Pennsylvania.

16. Defendants MEI QIAO ZHENG and YAN YU ZHENG, a/k/a “Aunti Bi,” used intimidation and the threat of force and violence, including physical harm to X.G., to X.G.’s minor child, and to her family in China, to attempt to collect the smuggling debt owed by X.G. when X.G. failed to pay the money. Defendants MEI QIAO ZHENG and YAN YU ZHENG used the reputation of snakeheads for violence to terrorize X.G. so that X.G. would pay her smuggling debt.

### **OVERT ACTS**

In furtherance of the conspiracy and to effect the object thereof, the defendants committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. In or about late summer 2003, defendant MEI QIAO ZHENG, who was in China, spoke by telephone with X.G., who was in the Eastern District of Pennsylvania, and threatened that snakeheads would harm X.G.’s child by cutting off the child’s hand if X.G. did not pay the smuggling debt in full.

2. On or about November 3, 2003, at approximately 11:06 a.m., defendant MEI QIAO ZHENG, who was in China, spoke by telephone to X.G., who was in the Eastern District of Pennsylvania, and told X.G. that upon her release from the detention facility X.G. must pay

the smuggling debt, telling her that “to live or die,” it was up to X.G.. In this telephone conversation, defendant MEI QIAO ZHENG provided X.G. with the name and phone number of defendant YAN YU ZHENG, a/k/a “Aunti Bi,” as a point of contact in the United States.

Defendant MEI QIAO ZHENG also advised that defendant YAN YU ZHENG would transport X.G. and her child from the facility, and that if the smuggling debt was paid in the United States, someone would pick it up.

3. On or about November 13, 2003, at approximately 10:16 a.m., defendant YAN YU ZHENG, a/k/a “Aunti Bi,” who was in Philadelphia, Pennsylvania, spoke by telephone to X.G., who was in the Eastern District of Pennsylvania, and provided X.G. with defendant YAN YU ZHENG’s cell phone number and business phone number directing X.G. to call her when X.G. was released from the detention facility. During the same conversation, defendant MIN ZHANG ZHENG, a/k/a “Uncle,” also spoke with X.G. and advised X.G. not to go with someone “not familiar” to her and that it would be “troublesome” if X.G. were picked up by others.

4. On or about January 9, 2004, at approximately 11:28 a.m., defendant YAN YU ZHENG, a/k/a “Aunti Bi,” who was in Philadelphia, Pennsylvania, spoke by telephone to X.G., who was in the Eastern District of Pennsylvania, and stated to X.G. that defendant YAN YU ZHENG would provide transportation and temporary housing for X.G. and her child upon release from the detention facility and that they would talk further about payment of the smuggling debt when she was released from custody.

5. On or about January 29, 2004, at approximately 6:41 p.m., defendant MIN ZHANG ZHENG, a/k/a “Uncle,” who was in Philadelphia, Pennsylvania, spoke by telephone to

X.G., who was in the Eastern District of Pennsylvania, and discussed X.G.'s ability to pay off the smuggling debt through a loan of money from the employer of X.G.'s husband. Defendant MIN ZHANG ZHENG directed X.G. to stay in contact with defendant YAN YU ZHENG, a/k/a "Aunti Bi."

6. On or about February 2, 2004, at approximately 4:43 p.m., defendant MIN ZHANG ZHENG, who was in Philadelphia, Pennsylvania, spoke by telephone to X.G. and again discussed X.G.'s paying off the smuggling debt by borrowing the money, and defendant MIN ZHANG ZHENG stated he would take X.G. to get the money.

7. On or about February 2, 2004, at approximately 4:55 p.m., defendant MIN ZHANG ZHENG, a/k/a "Uncle," who was in Philadelphia, Pennsylvania, spoke by telephone to X.G. and told X.G. that defendant YAN YU ZHENG, a/k/a "Aunti Bi," will call X.G. as to whom X.G. is to make debt payments. Defendant MIN ZHANG ZHENG suggested that X.G. talk with defendant YAN YU ZHENG that evening.

8. On or about February 2, 2004, at approximately 11:10 p.m., defendant YAN YU ZHENG, a/k/a "Aunti Bi," who was in Philadelphia, Pennsylvania, spoke by telephone to X.G. and directed X.G. to call defendant MEI QIAO ZHENG in China. Defendant YAN YU ZHENG suggested that X.G. "put" the money for the smuggling debt at defendant YAN YU ZHENG's place, and told X.G. that defendant YAN YU ZHENG would call defendant MEI QIAO ZHENG to arrange for the money to be picked up.

9. On or about February 3, 2004, at approximately 8:41 a.m., defendant MEI QIAO ZHENG, who was in China, spoke by telephone to X.G., who was in the Eastern District of Pennsylvania, and directed X.G. to drop off the money for the smuggling debt at defendant

YAN YU ZHENG's place. Defendant MEI QIAO ZHENG told X.G. to tell X.G.'s mother in China to "gather" money to repay the balance of the smuggling debt or there will be "a lot of noise."

10. On or about February 3, 2004, at approximately 3:47 p.m., defendant YAN YU ZHENG, a/k/a "Aunti Bi," who was in Philadelphia, Pennsylvania, spoke by telephone to X.G. and stated that defendants YAN YU ZHENG and MIN ZHANG ZHENG would collect the debt money from X.G. for the defendant MEI QIAO ZHENG. Defendant YAN YU ZHENG instructed X.G. to leave the money at defendant YAN YU ZHENG's "place" and that someone would pick it up later on. Defendant YAN YU ZHENG told X.G. to say defendant YAN YU ZHENG was her "aunt," so that defendant YAN YU ZHENG would have a "defense" if "shit hit the fence."

11. On or about February 14, 2004, at approximately 10:44 a.m., defendant MEI QIAO ZHENG, who was in China, spoke by telephone to X.G., who was in the Eastern District of Pennsylvania, and told X.G. to bring \$20,000 cash to the restaurant of defendant YAN YU ZHENG, a/k/a "Aunti Bi," and that defendant MEI QIAO ZHENG would then talk to "the boss" about payments. Defendant MEI QIAO ZHENG threatened that if X.G. did not pay the debt, people would "find" her and it "would not be good." Defendant MEI QIAO ZHENG referred to X.G.'s child and warned: "You only have this child."

12. On or about February 14, 2004, at approximately 11:40 a.m., defendant YAN YU ZHENG, a/k/a "Aunti Bi," who was in Philadelphia, Pennsylvania, spoke by telephone to X.G. who was in the Eastern District of Pennsylvania, and threatened X.G. for not paying smuggling debt, stating that it would be impossible for X.G. and her child to hide from the

snakeheads, and that when caught by the snakeheads, X.G. and her family, including her family in China, would be in “deep trouble.” Defendant YAN YU ZHENG threatened that the consequences would be bad for X.G. and that X.G.’s “young one” would be “taken.” Defendant YAN YU ZHENG further warned that the snakeheads would collect tens of thousands of dollars more from her and force her to pay interest.

13. On or about March 3, 2004 at approximately 10:56 a.m., defendant YAN YU ZHENG, a/k/a “Aunti Bi,” who was in Philadelphia, Pennsylvania, spoke by telephone to X.G. and told X.G. that X.G. “cost trouble” and that defendant YAN YU ZHENG did not “earn one cent.” Defendant YAN YU ZHENG told X.G. there was no need for X.G. to call defendant YAN YU ZHENG and to call defendant MEI QIAO ZHENG.

All in violation of Title 18, United States Code, Section 894(a)(1).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**PATRICK L. MEEHAN**  
**United States Attorney**